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August 17, 2020

Via ECF

The Honorable Ona T. Wang
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *In re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A. for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings*, No. 20-mc-199-JGK-OTW

Dear Judge Wang,

We write on behalf of Fine Arts NY LLC (“Fine Arts”), a recipient of a subpoena served by applicants Vale S.A., Vale Holdings B.V., and Vale International S.A. (collectively, “Vale”). Fine Arts respectfully joins in Perfectus Real Estate Corp. and Tarpley Belnord Corp.’s letter requesting the Court deny Vale’s proposal for an order setting interim deadlines. *See* Letter, Dkt. 56.

Fine Arts is already searching for responsive documents, a process that has been significantly complicated by Vale’s extraordinarily broad subpoena and the realities of coordination between counsel and clients who are travelling internationally during the month of August. The ongoing pandemic has made discovery still more difficult, as our clients must now coordinate access to and review of documents from different countries. Notwithstanding these obstacles, Fine Arts notified counsel for Vale that it would do its best to complete production by the end of the first week in September. In light of Fine Arts’ voluntary, good-faith engagement with the discovery process, Vale has

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simply not demonstrated any need for an order from this Court. Fine Arts therefore requests that the Court deny Vale's requested interim deadlines.

Sincerely,

/s/ Jennifer Selendy

Jennifer Selendy
Managing Partner

CC: All Counsel of Record (via ECF)